

**THE REICH LAW FIRM**

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*Counsel for Defendants  
GH Express Cali Inc. and Manjinder Kaur*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

PROCAPS LABORATORIES, INC, a Nevada  
corporation

Plaintiff,

v.

GH EXPRESS CALI, INC, a Foreign  
Corporation; MANJINDER KAUR d/b/a GH  
EXPRESS; DOES 1-10, inclusive; and ROES  
1-10 inclusive

Defendants.

GH EXPRESS CALI INC,

Counterclaimant,

v.

PROCAPS LABORATORIES INC,

Counter Defendant.

Case No. 2:21-CV-02016-CDS-BNW

**MOTION OF DEFENDANTS GH  
EXPRESS CALI, INC., AND  
MANJINDER KAUR d/b/a GH  
EXPRESS TO FURTHER EXTEND  
TIME WITHIN WHICH DEFENDANTS  
MUST ENGAGE LOCAL COUNSEL**

COME NOW Defendants, GH EXPRESS CALI, INC. ("GH EXPRESS") and MANJINDER KAUR d/b/a GH EXPRESS ("Kaur") (collectively the "Defendants"), by and through their counsel of record, Jeff Reich of the Reich Law Firm, and hereby file this Motion To Further Extend the Time within which Defendants Must Engage Local Counsel. We request an additional two weeks, to and including January 13, 2022. The Court's prior Order, gave us until tomorrow, December 30, 2022, to comply.

I have received written communication from local counsel, Brian Berman, that he is willing to serve as local counsel, as required by Local Rule LR IA 11-2(d). He has also informed me that he is on vacation and will not be available to finalize the paperwork until the week of January 9<sup>th</sup>.

1 These are my reasons for requesting a further extension of time, to and including January  
2 13, 2023, in which to file this request for additional time to comply with this Court's order that we  
3 have local counsel of record.

4 Good cause exists for this request. The Christmas season has made it more difficult for us  
5 to find and to contact local counsel to request help. But, I have finally made arrangements and  
6 request sufficient time to complete our obligations regarding local counsel.

7 Opposing counsel, Mr. Infuso, has extended professional courtesy, so our issue here does  
8 not wreak havoc with the overall discovery schedule. One side or the other may ultimately present  
9 a request for protective order to the Court, if necessary, but that does not affect this request for an  
10 extension.

11 Accordingly, because we are in the midst of the Christmas season, Defendants seek an  
12 extension of two weeks, until December 30, 2022, to designate new local counsel.

13 Dated this 29<sup>th</sup> day of December, 2022.  
14

15 **THE REICH LAW FIRM**

16 /s/ Jeff Reich  
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21 *Counsel for Defendants/Counterclaimants*  
22 *GH Express Cali Inc. and Manjinder Kaur*

23 **ORDER**

24 IT IS ORDERED that ECF No. 68 is GRANTED. The deadline for Defendants to  
25 retain local counsel is extended until January 13, 2023.

26 IT IS SO ORDERED  
DATED: 3:33 pm, January 03, 2023

27   
28 BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5(b), I hereby certify that the undersigned served by mail, with first-class postage prepaid, and served electronically

**MOTION OF DEFENDANTS GH EXPRESS CALI, INC., AND MANJINDER KAUR d/b/a GH EXPRESS TO FURTHER EXTEND THE TIME WITHIN WHICH DEFENDANTS MUST ENGAGE LOCAL COUNSEL**

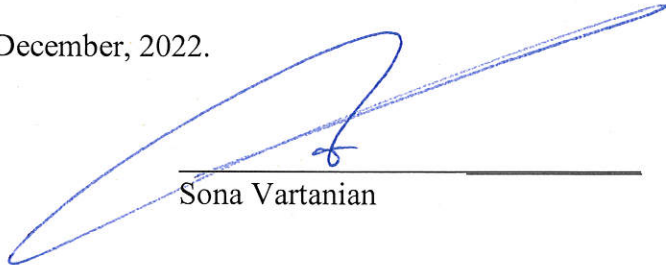
To the following, addressed as follows:

Michael V. Infuso  
Green Infuso, LLP  
3030 South Jones Blvd, Suite 101  
Las Vegas, Nevada 89146  
Email: [minfuso@greeninfusolaw.com](mailto:minfuso@greeninfusolaw.com)

I further certify that I am not a party to this lawsuit, I am over 18 years of age, and am employed as follows:

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[rlaw@reichlaw.com](mailto:rlaw@reichlaw.com)

Dated this 29th day of December, 2022.

  
\_\_\_\_\_  
Sona Vartanian

CERTIFICATE OF SERVICE